

**REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action mailed October 20, 2006. Claims 23-36 were pending in the present application. This Amendment amends claims 23, 28, and 30, and cancels claims 29 and 31, leaving pending in the application claims 22-28, 30, and 32-36. Reconsideration of the rejected claims is respectfully requested.

**I. Rejection under 35 U.S.C. §102**

Claims 23-27 and 36 are rejected under 35 U.S.C. 102(e) as being anticipated by *Kauser* (US 5,724,660). Applicants respectfully submit that *Kauser* does not disclose each element of these claims.

For example, Applicants' claim 23 as amended recites a method comprising:

**receiving first location information from a first location finding equipment**, wherein the first location information has first geographic location information, and first uncertainty information in a first format;

**receiving second location information from a second location finding equipment**, wherein the second location information has second geographic location information, and second uncertainty information in a second format, wherein the first format and the second format are different;  
converting at least one of the first uncertainty information or the second uncertainty information into a standard format; and

**using the first uncertainty information and the second uncertainty information to determine a reduced uncertainty associated with a location of a wireless station, the reduced uncertainty having less uncertainty than either of the first and second uncertainty information**

(*emphasis added*). Such limitations are not disclosed by *Kauser*.

*Kauser* discloses a system for determining the location of a mobile phone using geometric location data based on relative signal strength from nearby cell antennas (e.g., triangulation) as well as GPS data (col. 2, line 62-col. 3, line 15). For the geometric data, the three strongest signal strengths are determined, which then are used to estimate the distance of the mobile phone from each of the antennas (col. 6, line 24-col. 6, line 50). Using each distance estimate as a radius of a circle from about antenna, an estimate ("zone 1") can be made of the location of the phone, but this estimate will come with some error as the three circles generally will not intersect at exactly the same point (col. 7, line 41-col. 8, line 14; Figs. 5 and 6). Varying estimate components for the signals can be used to determine a potentially more accurate second estimate ("zone 2") (col. 8, lines 15-18).

In order to further improve the position determination, *Kauser* combines the uncertainty of the geometric data with GPS information (col. 9, line 19-col. 9, line 39). The accuracy of the GPS data can be uncertain, however, as factors such as line of sight can affect the GPS data (col. 9, lines 30-39; Fig. 9). In order to minimize the effects of these uncertainties, *Kauser* computes a moving average of latitude and longitude, and calculates a peak error for the latitude and longitude at each time window (col. 9, line 40-col. 10, line 44). These error values then are used to store the last reliable GPS data (coordinates) in memory (col. 10, line 51-col. 11, line 5). If the peak errors are within the threshold values, then "the instantaneous coordinate values are stored in memory," and if the peak errors are not within the threshold values "the instantaneous coordinate values are not stored" (col. 11, lines 16-25).

The last reliable GPS data then is compared to the geometric data (col. 11, lines 43-67). If the GPS data defines "a location that is within zone 2", then the GPS coordinates are returned "as the location estimate with a high confidence level" (col. 11, lines 58-64). If the GPS coordinate are within zone 1, but outside zone 2, then the GPS coordinates are returned "as the location estimate with a moderate confidence level" (col. 11, lines 64-67). If the GPS coordinates are outside zone 1, then the zone 2 geometric location estimate is returned "with a moderate confidence level" (col. 11, lines 51-58). The position estimate of *Kauser* then is either the GPS data or the geometric uncertainty, based on their relative positions.

Alternatively, Applicants' claim 23 requires "using the first uncertainty information and the second uncertainty information to determine a reduced uncertainty associated with a location of a wireless station, the reduced uncertainty having less uncertainty than either of the first and second uncertainty information" As discussed, *Kauser* does not disclose or suggest using uncertainties from different location finding equipment to determine a reduced uncertainty that is less than any of the uncertainties used for location purposes, instead using the either the first or second estimate from either the first or second location finding equipment. As such, *Kauser* cannot anticipate claim 23 and dependent claims 24-27 and 36. Applicants therefore respectfully request that the rejections with respect to claims 23-27 and 36 be withdrawn.

## II. Rejection under 35 U.S.C. §103

### (a) Kauser in view of Tayloe

Claims 28-31 are rejected under 35 U.S.C. §103(a) as being obvious over *Kauser* in view of *Tayloe* (US 5,826,188). Applicants' claim 28 requires a method defined by:

first receiving, at a system via an interface, a location request regarding a wireless station from a wireless location application, wherein the interface is for communication between the system and the wireless location application, where the interface defines a standard for requesting and providing requested location information, wherein the interface is capable of receiving a plurality of location requests from different applications in a plurality of different formats and is capable of converting the plurality of location requests into the standard;

second receiving, at the system, a first location input based on first location information provided by the first location source, and a second location input based on second location information provided by the second location source, wherein the first and second sources use different location finding technologies;

storing data relating to the first location input and the second location input in a memory accessible by the system;

obtaining the requested location information by retrieving the data relating to the first and second location inputs from the memory based on the location request and combining the data relating to the first and second location inputs, the first and second location inputs being associated with a respective first and second uncertainty, the obtained requested location information having a reduced uncertainty that is less than either of the first and second uncertainties; and

outputting the requested location information to the wireless location application

(*emphasis added*). Such limitations are neither taught nor suggested by *Kauser* and *Tayloe*.

As recognized in the Office Action on page 6, *Kauser* fails to teach or suggest "an interface for receiving a request, wherein the interface is capable of receiving a plurality of location requests from different applications in a plurality of different formats and is capable of converting the plurality of location requests into the standard." Further, as discussed above, *Kauser* does not teach or suggest using uncertainties from different location finding equipment to determine a reduced uncertainty that is less than any of the uncertainties used for location purposes, instead using the either the first or second estimate from either the first or second location finding equipment. As such, *Kauser* cannot render obvious Applicants' claim 28.

*Tayloe* fails to make up for these deficiencies in *Kauser* with respect to claim 28. *Tayloe* discloses a system for handing off calls between different networks having different interfaces or standards (col. 1, lines 15-17; col. 2, line 65-col. 3, line 10). Because the networks can have different standards, it can be necessary to convert the "location data" for a subscriber unit (e.g.,

phone) from a format for the old network to a format for the new network (col. 7, lines 58-65; col. 8, lines 59-64; col. 9, lines 20-27). *Tayloe* does not teach or suggest using uncertainties from different location finding equipment to determine a reduced uncertainty that is less than any of the uncertainties used for location purposes. Further, *Tayloe* does not teach or suggest the conversion of a plurality of requests into "a standard for requesting and providing requested location information" as required by Applicants' claim 28. Further still, *Tayloe* is directed at transmitting location information between networks, and does not teach or suggest an interface "capable of receiving a plurality of location requests from different applications in a plurality of different formats" and "converting the plurality of location requests into the standard" as required by Applicants' claim 28. As such, Applicants' claim 28, and dependent claims 29-31, cannot be rendered obvious by *Kauser* and *Tayloe*, either alone or in combination. Applicants therefore respectfully request that the rejection with respect to claims 28-31 be withdrawn.

(b) Kauser in view of Tayloe and Eizenhoefer

Claims 32-34 are rejected under 35 U.S.C. §103(a) as being obvious over *Kauser* and *Tayloe*, and further in view of *Eizenhoefer* (US 5,809,424). Claims 32-34 depend from claim 28, which is not rendered obvious by *Kauser* and *Tayloe* as discussed above. *Eizenhoefer* does not make up for the deficiencies in *Kauser* and *Tayloe* with respect to claim 28. *Eizenhoefer* is cited as teaching that "a location request includes an information element indicating the level of accuracy of location finding requested," as well as "choosing the method of location finding" based on the accuracy level (OA p. 8). Such a teaching still would not make up for the deficiencies in *Kauser* and *Tayloe* with respect to claim 28, as *Eizenhoefer* fails to teach or suggest using uncertainties from different location finding equipment to determine a reduced uncertainty that is less than any of the uncertainties used for location purposes, or an interface "capable of receiving a plurality of location requests from different applications in a plurality of different formats" and "converting the plurality of location requests into the standard" as required by Applicants' claim 28. Therefore, claim 28 and dependent claims 32-34 cannot be rendered obvious by *Kauser*, *Tayloe*, and *Eizenhoefer*, individually or in any combination. Applicants therefore respectfully request that the rejection with respect to claims 32-34 be withdrawn.

(c) Kauser in view of Tayloe, Eizenhoefer, and Singer

Claim 35 is rejected under 35 U.S.C. §103(a) as being obvious over *Kauser*, *Tayloe*, and *Eizenhoefer*, and further in view of *Singer* (US 5,485,163). Claim 35 depends from claim 28, which is not rendered obvious by *Kauser*, *Tayloe*, and *Eizenhoefer* as discussed above. *Singer* does not make up for this deficiency in *Kauser*, *Tayloe*, and *Eizenhoefer* with respect to claim 28. *Singer* is cited as teaching that "a request may include a request for tracking." (OA p. 9). Such teaching, even if obvious to combine, still would not make up for the deficiencies in *Kauser*, *Tayloe*, and *Eizenhoefer* discussed above. Therefore, claim 28 and dependent claim 35 cannot be rendered obvious by *Kauser*, *Tayloe*, *Eizenhoefer*, and *Singer*, individually or in any combination. Applicants therefore respectfully request that the rejection with respect to claim 35 be withdrawn.

**III. Amendment to the Claims**

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,



Jason D. Lehr  
Reg. No. 48,163

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 925-472-5000  
Fax: 415-576-0300  
Attachments  
JDL:km  
60799684 v1